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April 19, 1985

HAND DELIVERED

U.S. Environmental Protection Agency
Region X
1200 6th Avenue
Seattle, Washington 98101

ATTN: Judi Schwarz
Superfund Branch M/S 525

Re: Comments of Standard Equipment, Inc. on the Feasibility Study for Subsurface Cleanup, Western Processing, Kent, Washington (EPA 37.0L16.2, March 6, 1985)

Dear Ms. Schwarz:

We have been asked to forward to you the comments of Standard Equipment, Inc. ("Standard") on the Feasibility Study for the subsurface cleanup at the Western Processing site in Kent, Washington. In addition to the comments made herein, we enclose a report prepared by our consultants, Hydro Geo Chem, Inc. The report as well as the transcripts of the public hearings appended to the report are part of Standard's comments. Incidently, we did not include a copy of the transcript for the first public hearing conducted on March 21, 1985 because we do not have a transcript of that hearing. The potentially responsible parties do have a transcript for that hearing and we have requested it several times but to date we have not received a copy. Should you receive a copy of the transcript, we ask that you consider it as part of Standard's comments on the Feasibility Study.

INSUFFICIENT DATA:

There is one inescapable and absolutely critical conclusion that precedes all else: there simply is insufficient information upon which to base a reasonable decision as to what the final cleanup should entail. On-site, the borings and wells are too shallow. They should have been extended until no contamination was present. Very serious contamination was found at the bottom of many wells and borings. Both logic and normally accepted scientific procedures for the

evaluation of contamination at hazardous waste sites require that the wells and borings be extended until no contamination is present.

Off-site, the lack of data is even more severe. As pointed out by our consultants, Hydro Geo Chem, Inc., the off-site wells with only a few exceptions were not placed in positions to intercept the plumes of contamination projected by the EPA in 1983. Moreover, as with the on-site wells, many of the off-site wells do not go deep enough. Not only must the wells extend until no contamination is present, there must be a sufficient number of properly placed wells to a depth of approximately 100 feet in order to determine groundwater vertical head data. Without such data you cannot determine contaminate migration and, in particular, you cannot determine the effect of Mill Creek on the local groundwater flow.

The lack of groundwater samples west of Mill Creek is particularly destructive to any reasonable understanding of the local groundwater flow and the spread of contaminants in the area. The findings at Well MW35 simply have not been adequately explained. It is entirely possible that the organic contaminants found in this well originated at Western Processing. More tests and analyses are necessary. At this point it is improper to disregard this contamination because it is difficult to correlate both the metal and organic contamination with Western Processing. The reasoning presented in the Feasibility Study at page 3-164 is impersuasive.

There are also insufficient data on the nature and extent of the contamination in the unsaturated zone off-property. It is not possible at this time to determine how much soil has to be removed. For example, in the portion of Standard's property designated area V in the Feasibility Study, it is probable that additional testing will show that soil must be removed farther to the west than presently indicated in example No. 5. In addition, the depth of excavation in area V specified in example No. 5 (3 feet) is inadequate, particularly in that portion of area V which is close to the boundary of Western Processing. If, as stated in example No. 5, it is necessary to take the soil out to a depth of 15 feet along the western boundary of the site, it is not possible that a 3 foot excavation would be adequate on the other side of the property line. What is clear is that more data is necessary and that more soil than is indicated will have to be removed.

As Hydro Geo Chem notes in its report, even the consultants engaged by the government have commented on the deficiency in the data base. Also in that regard, we point out that the potentially responsible parties have refused to

comment on the adequacy of the data base. For example, Mr. Lewis, one of the Boeing members on the PRP Coordinating Committee, interjected at the March 28, 1985 public meeting in response to a question about the data base directed to Dr. Landau:

> Mr. Lewis: Well, Greg, we are not going to deal with the data base if you're questioning whether the data base is accurate. Again, your question is addressed to the EPA, not to us. We used, in developing our plan, the EPA data base and, therefore, if you want to question the data base, it isn't appropriate to address it to us. . . . [Omitting question]. . . .We're not going to comment on the adequacy of the data base. (Transcript of Public Meeting, March 28, 1985 at p.81, lines 12-17, 22-23.)

DECISION ON FINAL CLEANUP PLAN:

The apparent proposal by the EPA and by CH2M Hill that a cleanup plan may be adopted now because the present data base will be augmented by additional data before deciding on a final design, does not, in our view, constitute an acceptable procedure. If sufficient data were available to make an intelligent choice of a cleanup plan with the need to gather additional data only to "fine tune" the system, perhaps such a procedure would be acceptable. This is not the case, however. There are presently gross gaps in the data base which necessitate far more than a fine tuning. For example, despite the presence of halocarbons at near-saturated concentrations at well 21, there has been no investigation whether there has been contamination of the deep acquifer by density-driven halocarbon plumes. As a second example, there have been technical questions raised concerning the accuracy and usefulness of the Battelle groundwater model without further calibration and without taking into account the heterogeneity of the acquifer system. The accepted fact that groundwater flows under the east drain against the regional gradient does not lend much support to the theory that groundwater does not flow under Mill Creek in the shallow acquifer with the local and regional gradient.

The lack of data is likely to result in a fundamental misunderstanding of the flow and contaminate distribution. It is simply not possible to determine at this time what type and duration of groundwater pumping will be necessary to clean the serious contamination spreading off-site. In particular, it

is not possible to determine if and how contaminated groundwater west of Mill Creek will be cleaned.

If the public comment period is to have any meaning, the missing data must be collected, interpreted and presented to the public for comment before any decisions are made on a final cleanup plan. That is not to say that nothing can be done at this time. It is obvious that substantial contaminated soil must be removed from both on and off-site areas. This highly contaminated soil is the source for the groundwater contamination and the sooner it can be removed the better. Standard strongly urges that the only reasonable alternative at this time is to:

1. Begin immediately the removal of the contaminated soils both on and off-site;

2. Begin immediately a comprehensive sampling and analysis program to fill in the critical gaps of knowledge which have been identified by virtually every scientific authority addressing the issue;

3. Publish a supplemental Remedial Investigation report;

4. Develop one or more realistic example alternative remedial action plans, which determine ultimate soil removal and which includes a groundwater pumping scheme that will result in returning the acquifer to drinking water standards; and

5. Publish a Supplemental Feasibility Study, conduct additional public hearings and receive additional written comments, and then decide upon a final cleanup plan.

This procedure would result in no additional delay and in fact would speed up the cleanup while also significantly increasing the probability of a more effective and perhaps less costly cleanup. It should be noted that Standard posed the following question at the April 4, 1985 public meeting:

> Comment on the practicality of breaking the sub-surface cleanup into two phases with the soil removal beginning as soon as possible, this summer for sure, and with the groundwater cleanup plan being deferred until additional data is collected to more adequately define the problem.

The EPA declined to comment on this question and no one from the audience offered comment either. Present in the audience

were representatives of the potentially responsible parties, the Washington Department of Ecology and, of course, the EPA. See transcript to Public Hearing April 4, 1985 at page 93, line 25 through page 94, line 11. It should be noted that this question, along with others, was submitted to the EPA and to the PRPs in writing the day before the public meeting.

EXAMPLE ALTERNATIVE REMEDIAL ACTION PLANS:

With regard to the example alternative remedial actions presented in the Feasibility Study we have the following specific comments.

Example 1: We understand this example was included only because federal regulations require a "no action" alternative. It is absolutely and obviously unacceptable.

Examples 2 and 3: Both Examples 2 and 3 leave highly contaminated soil in place on Western Processing, Standard and other offsite areas. Not only is this unacceptable but it is contrary to state law, as acknowledged in the Feasibility Study (Vol. II, p. B-28).

Example 4: This example proposed by the potentially responsible parties has some merit in that it removes soil from the site, as Standard believes is absolutely necessary, and it includes groundwater pumping, also as Standard believes is absolutely necessary. The plan is, however, unacceptable as it:

1. Totally ignores off-site contamination and thereby leaves gross levels of contamination surrounding the site;

2. Determines groundwater cleanup predicted on a simplistic and probably erroneous groundwater model;

3. Determines what soil is to be removed based on an inadequate data base;

4. Determines groundwater pumping based on an inadequate data base;

5. Will not clean the acquifer below about 40 feet and this valuable acquifer may well be contaminated;

6. Includes a slurry wall that isolates serious contamination from the principal groundwater flushing system, perhaps aggravating rather than alleviating off-site contamination problems;

7. Ultimately causes contaminates to discharge into the deeper (40 to 100 feet) regional acquifer; and

8. Leaves unacceptable levels of contamination, even if it works as well as the PRPs predict.

It should also noted here that the potentially responsible parties refused or avoided answering questions about the technical aspects of their plan at the public hearings. An example is the PRPs refusal to meaningful discuss the location and the cleanup efficiency of their slurry wall. Specifically, please note the dialogue at pages 87-90 in the March 28 transcript and pages 49-57 in the April 4, transcript.

Example 5: On the data base available, one must conclude that example 5 has the most likelihood of accomplishing the remedial action necessary on-site, but off-site cleanup is insufficient. It is the most expensive of the alternatives and it is possible that with additional data, a less expensive remedial plan could be defined that would do a satisfactory job of cleaning up the contaminants.

Example 6: As with example 1, it is our understanding that this example was included only because of the federal regulations requiring a "no action" alternative. It is totally unacceptable.

Example 7: Mill Creek must be cleaned up and must be restored to a level of cleanliness that will permit fish, birds, plant and other aquatic life to utilize the stream. We find the observation that there are contaminants in Mill Creek which apparently do not come from Western Processing but come from up-stream sources to be irrelevant. All contamination from Western Processing to Mill Creek must be stopped as soon as possible and the contamination remaining in the sediment removed. Again, however, the data base is insufficient to describe exactly what must be done to Mill Creek. Until the groundwater is cleaned, efforts to clean Mill Creek will be ineffective.

Pumping Alternatives: The pumping alternatives contained in the various example alternative remedial action plans suffer from a common deficiency of lowering the water table and leaving contamination sorbed to the soil. When pumping is stopped, the water level will rise to its natural level and thereby release contaminates to the groundwater system, which will eventually flow to Mill Creek and off-site properties.

Areas III and IV: None of the example alternative remedial action plans addresses the need to remove soil from area III yet test data indicates that unacceptable levels of

contaminates are present in this area. Similarly the north-east corner of area IV probably will require remedial action but the data are insufficient to make this determination now.

COMMENTS BY CH2M HILL:

The comments and conclusions drawn by the EPA's primary consultant, CH2M Hill, generally express a greater confidence in the adequacy of the data base than is warranted. In particular, see Mr. Geitner's and Mr. Randall's comments in the transcript of the April 4, 1985 public hearing at pages 4-14. CH2M Hill's conclusions are based, in part, upon the analysis and evaluation of other EPA consultants, including Hart & Crowser and Battelle. The latter consultants qualify their conclusions where necessary and comment on areas in which data are insufficient to make a valid conclusion. The EPA should be careful to not lose such important qualifiers in the translation from the consultants performing the work to CH2M Hill.

ABANDONMENT OF THE SHALLOW ACQUIFER:

None of the example alternative remedial action plans cleans the contamination from the shallow acquifer to drinking water standards. See transcript of April 4, 1985 public meeting at page 88, line 13 through page 89, line 17. Thus, the unstated but obvious conclusion of the Feasibility Study is that the shallow acquifer can be abandoned because it is not presently used for a drinking water source. This basic premise is totally unjustified and is unacceptable.

COMMENTS BY THE CITY OF KENT:

Standard agrees with most of the comments of the City of Kent, particularly as to concerns expressed for the future use of the Western Processing site and the surrounding property and the concerns expressed for water quality. With respect to the process for arriving at a final design for the cleanup, Standard appreciates the City's concern for involving the public in this process but respectfully suggests that the City has not gone far enough. To be adequately involved in the process, the public will need more than the dissemination of additional information from the government following the agreement with the PRPs for cleanup. As Standard proposed above, it is possible to get the cleanup underway immediately while still preserving the right of the public to take part in the decision making process for the final cleanup.

CONCLUSION:

Considering the seriousness and the magnitude of the problems caused by Western Processing we feel it is absolutely essential that the additional data necessary to define a proper cleanup plan be gathered at the earliest possible opportunity. There can be no compromise in this area. The final cleanup plan must do a quality job and we simply are not ready to make that decision at this time with the data base available today. The cleanup of the contaminated soil must begin immediately, however, as too much delay has already been suffered.

Sincerely,

Steven W. Hale

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